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35240-001

July 14, 2025

Via ECF

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street, 4th Floor
Camden, New Jersey 08101

**Re: Reliance Platinum d/b/a Reliance Financial v. Daryl Fred Heller
Adv. Proc. No. 25-1117 (JNP)**

Dear Judge Poslusny:

As Your Honor is aware, this firm represents Daryl Fred Heller (“Heller”), a party in the above referenced matter.

On March 17, 2025, Heller filed a notice of removal to have the underlying matter be heard in this Court. ECF 1. On April 21, 2025, I filed a status report advising there were counterclaims in this action. While Reliance Platinum filed a notice of dismissal of the underlying action, it was dismissed without prejudice. Heller did not dismiss his counterclaims. Reliance Platinum has not appeared in this matter or filed any responsive pleading to the asserted counterclaims.

On July 11, 2025, this Court filed an Order to Show Cause for Dismissal of Adversary Proceeding for Lack of Prosecution. ECF 11. Heller respectfully requests this matter to be dismissed with prejudice. Marshall T. Kizner, counsel for the other parties in this matter consents and joins in on this request.

As always, Your Honor’s courtesy is much appreciated.

Respectfully submitted,

/s/ Sari B. Placona

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